

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

FILED
OCT 13 2016
THOMAS G. BRUTON
CLERK, U.S. DISTRICT COURT

UNITED STATES OF AMERICA

vs.

BENJAMIN BIANCOFIORI, a/k/a "Beanz"

)
) No. 16 CR 306
)

) Judge Leinenweber

) **MAGISTRATE JUDGE GILBERT**

) Violation: Title 18, United

) States Code, Section 1591(a)

) and (b)(1)
)

) **SUPERSEDING INDICTMENT**

COUNT ONE

The SPECIAL AUGUST 2015 GRAND JURY charges:

Beginning in or about 2007, and continuing until in or about August 2012, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim A, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim A, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim A to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT TWO

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about April 2015, and continuing until at least May 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim B, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim B, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim B to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT THREE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about September 2015, and continuing until in or about May 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim C, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim C, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim C to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT FOUR

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about December 2015, and continuing until in or about May 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim D, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim D, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim D to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT FIVE

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about November 2015, and continuing until in or about February 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim E, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim E, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim E to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

COUNT SIX

The SPECIAL AUGUST 2015 GRAND JURY further charges:

Beginning in or about January 2016, and continuing until in or about March 2016, in the Northern District of Illinois, Eastern Division, and elsewhere,

BENJAMIN BIANCOFIORI, a/k/a "Beanz,"

defendant herein, in and affecting interstate commerce, knowingly recruited, enticed, harbored, transported, provided, obtained, and maintained by any means a person, namely, Victim F, and benefitted financially and by receiving anything of value from participation in a venture which has engaged in recruiting, enticing, harboring, transporting, providing, obtaining, and maintaining by any means Victim F, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, and coercion, and any combination of such means, would be used to cause Victim F to engage in a commercial sex act;

In violation of Title 18, United States Code, Section 1591(a) and (b)(1).

FORFEITURE ALLEGATION

The SPECIAL AUGUST 2015 GRAND JURY further alleges:

1. Upon conviction of an offense in violation of Title 18, United States Code, Section 1591, as set forth in this Superseding Indictment, defendant shall forfeit to the United States of America any property which constitutes and is derived from proceeds obtained, directly and indirectly, as a result of the offense; and any property used or intended to be used to commit or facilitate the commission of the offense, as provided in Title 18, United States Code, Section 1594(d)(1) & (2).

2. The property to be forfeited includes, but is not limited to:

- a. a personal money judgment in the amount of approximately \$115,000; and
- b. the following specific property:
 - i. approximately \$400 seized on or about May 11, 2016, from 1913 Golden Gate Lane, Naperville, Illinois;
 - ii. approximately \$4,169 seized on or about May 11, 2016 from the defendant;
 - iii. a 2013 Cadillac XTS Platinum, bearing VIN 2G61V5S33D9215140;
 - iv. approximately 176 pairs of men's shoes seized on or about May 11, 2016, from 1913 Golden Gate Lane, Naperville, Illinois; and
 - v. approximately seven pieces of jewelry valued at approximately \$10,200.

3 If any of the property described above, as a result of any act or omission by a defendant: cannot be located upon the exercise of due diligence; has been transferred or sold to, or deposited with, a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty, the United States of America shall be entitled to forfeiture of substitute property, as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL:

FOREPERSON

UNITED STATES ATTORNEY